



May 7, 2012

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Brian Crane
Director of Public Works
City of Redding
777 Cypress Avenue
Redding, California 96001

Jon McClain
Assistant Director of Public Works
City of Redding
20055 Viking Way, Bldg. 3
Redding, California 96003

Josh Vandiver
Wastewater Utility Supervisor - Collection Division
City of Redding
20055 Viking Way, Bldg. 3
Redding, California 96003

John Stacher
Storm Drain Utility Supervisor
City of Redding
20055 Viking Way, Bldg. 3
Redding, California 96003

Re: Notice of Violation and Intent to File Suit Under the Clean Water Act

Dear Mssrs. Crane, McClain, Vandiver, and Stacher:

I am writing on behalf of California Sportfishing Protection Alliance ("CSPA") in regard to violations of the Federal Water Pollution Control Act, 33 U.S.C. §§ 1251 *et seq.* ("Clean Water Act" or "CWA") by the City of Redding ("City" or "Redding"). The City is in violation of the Clean Water Act as a result of its repeated, continuous, and ongoing failures to comply with the terms and conditions of (1) *Waste Discharge Requirements for the City of Redding, Clear Creek Wastewater Treatment Facility*, Order No. R5-2003-0130, NPDES Permit No. CA0079731 ("2003 Clear Creek NPDES Permit"), (2) *Waste Discharge Requirements for the City of Redding, Clear Creek Wastewater Treatment Facility*, Order No. R5-2010-0096, NPDES Permit No. CA0079731 ("2010 Clear Creek NPDES Permit"), (3) *Waste Discharge Requirements for the City of Redding, Stillwater Wastewater Treatment Facility*, Order No. R5-2007-0058, NPDES Permit No. CA0082589 ("2007 Stillwater NPDES Permit"), and (4) *Waste Discharge Requirements for Stormwater Discharges From Small Municipal Separate Storm Sewer Systems (General Permit)*, State Water Resources Control Board, Order No. 2003-0005-DWQ, NPDES Permit No. CAS000004 ("MS4 Permit").

Notice of Violation and Intent to File Suit

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This letter is being sent to you, respectively, as the Director, Assistant Director, Wastewater Utility Supervisor – Collection Division, and Storm Drain Utility Supervisor of the City's Public Works Department, as required by the Clean Water Act and implementing regulations. CSPA puts the City on formal notice that, after the expiration of sixty (60) days from the date of this Notice of Violation and Intent To File Suit Letter ("Notice Letter"), CSPA intends to file suit in Federal District Court pursuant to Section 505(a) of the Clean Water Act, 33 U.S.C. §1365(a), against Redding for the violations described in this Notice Letter.

Section 505(b) of the Clean Water Act, 33 U.S.C. § 1365(b), requires that sixty (60) days prior to the initiation of a civil action under Section 505(a) of the Clean Water Act, 33 U.S.C. § 1365(a), a citizen must give notice of his/her intention to file suit. Notice must be given to the head of the state or local agency responsible for the violations, the Administrator of the United States Environmental Protection Agency ("EPA"), the Regional Administrator of the EPA, and the Executive Officer of the State of California's Water Resources Control Board ("State Board"). See 40 C.F.R. § 135.2.

CSPA intends on filing suit to seek injunctive relief pursuant to CWA Sections 505(a) and (d), 33 U.S.C. §1365(a) and (d), and declaratory relief and such other relief permitted by law to remedy the CWA violations outlined below. CSPA will also seek civil penalties pursuant to Section 309(d) of the Clean Water Act, 33 U.S.C. § 1319(d), and the EPA Regulation, Adjustment of Civil Monetary Penalties for Inflation, set forth at 40 C.F.R. § 19.4 (2009). These provisions authorize civil penalties for each separate violation of the Clean Water Act occurring between March 15, 2004 and January 12, 2009 of up to \$32,500 per day per violation, and \$37,500 per day per violation for violations occurring after January 12, 2009. Finally, CSPA will seek to recover its litigation costs, including attorneys' and experts' fees, pursuant to CWA Section 505(d), 33 U.S.C. § 1365(d).

I. ORGANIZATION GIVING NOTICE OF CLEAN WATER ACT VIOLATIONS

CSPA is a 501(c)(3) non-profit public benefit conservation and research organization. CSPA was established in 1983 for the purpose of conserving, restoring, and enhancing the state's water quality, wildlife and fishery resources, aquatic ecosystems and associated riparian habitats. CSPA accomplishes its mission by actively seeking federal, state, and local agency implementation of environmental regulations and statutes, and routinely participates in administrative, legislative and judicial proceedings. When necessary, CSPA directly initiates enforcement actions on behalf of itself and its members to protect public trust resources. CSPA's office is located at 3536 Rainier Avenue, Stockton, California 95204.

CSPA's members use and enjoy the Sacramento River, its tributaries, and the waters in and around the Redding area for fishing, boating, swimming, bird watching, picnicking, viewing wildlife, and engaging in scientific study. Information available to CSPA indicates that the City discharges raw and/or inadequately treated sewage into the Sacramento River and to waters that are tributary to the Sacramento River. These discharges of sewage and associated pollutants degrade water quality and harm aquatic life in these waters, and thus impairs CSPA's members' use and enjoyment of the waters. Further, the City's discharges of raw and/or inadequately

treated sewage are ongoing and continuous. As a result, CSPA's members' use and enjoyment of these waters has been and continues to be adversely impacted by the discharges of raw and/or inadequately treated sewage.

II. THE ENTITY RESPONSIBLE FOR THE CLEAN WATER ACT VIOLATIONS

Information available to CSPA indicates that the City provides wastewater collection, treatment, and disposal services to residents and business in Redding. The City's Wastewater Utility within the Public Works Department is responsible for the day-to-day operation and maintenance of the sewage collection system ("Collection System"), which is owned and operated by the City. The City's Wastewater Utility maintains an office at 20055 Viking Way, Building 3, Redding, California 96003. Among other things, the City is responsible for operating and maintaining the Collection System, including: preventing illicit discharges into the Collection System; properly designing and constructing sewers and connections; inspecting and repairing mainline sewer pipes; inspecting and repairing laterals owned or maintained by the City; limiting the discharge of fats, oils, and grease and other debris into the Collection System; and enforcing violations of its ordinances regarding discharges to its Collection System.

Information available to CSPA further indicates that the City owns and operates a municipal separate storm sewer system ("MS4"), which provides storm water drainage in the City. The City's Storm Drain Utility within the Public Works Department is responsible for the day-to-day operation and maintenance of the MS4. The City's Storm Drain Utility maintains an office at 20055 Viking Way, Building 3, Redding, California 96003.

III. THE COLLECTION SYSTEM, THE SEWAGE TREATMENT PLANTS, AND THE CITY'S NPDES PERMITS FOR THE COLLECTION AND TREATMENT OF SEWAGE

The City owns and operates the Collection System, which consists of 17 lift stations, and approximately 423 miles of collection mains. The City provides sewage collection and treatment services to a population of approximately 70,000 people. The City charges \$40.95 per month for single family residences to collect, convey, and treat sewage generated in the City.¹ The Collection System consists of pipes and other manmade conveyances, and is a point source under the Clean Water Act. *See* 33 U.S.C. § 1362(14). The Collection System collects and conveys sewage in the City's service area to one of two wastewater treatment plants – the Stillwater Wastewater Treatment Plant or the Clear Creek Wastewater Treatment Plant. The City owns and operates both of these treatment plants. Effluent from the Clear Creek Wastewater Treatment Plant is discharged to the Sacramento River. Effluent from the Stillwater Wastewater Treatment Plant is either discharged to the Sacramento River, or applied to land owned by the discharger.

The City has separate NPDES permits for each of its wastewater treatment plants. The City's 2003 Clear Creek NPDES Permit authorized and its 2010 Clear Creek NPDES Permit

¹ The charge to multi-family units and commercial and industrial dischargers are higher. A rate schedule can be found here <http://www.ci.redding.ca.us/municipalutilities/Docs/RATES/RATES%20WASTEWATER%202011-2012.pdf>

continues to authorize the City to discharge pollutants to the Sacramento River subject to certain terms and conditions. For example, a set of "effluent limitations" allow for the discharge of certain levels of pollutants in the effluent from the Clear Creek Treatment Plant to the Sacramento River via a single, authorized outfall. *See, e.g.*, 2010 Clear Creek NPDES Permit § IV.A.1. The 2003 Clear Creek NPDES Permit and the 2010 Clear Creek NPDES Permit also contain strict prohibitions regarding discharges from the City's sewage infrastructure, which includes the Collection System. For example, the 2010 Clear Creek NPDES Permit prohibits the discharge of wastewater from anywhere other than the single, authorized discharge point to the Sacramento River. 2010 Clear Creek NPDES Permit § III.A. and Attachment E (Monitoring and Reporting Program) § X.D.3. The 2003 Clear Creek NPDES Permit likewise prohibited any discharge other than at the single, authorized discharge point. 2003 Clear Creek NPDES Permit § A.1. The 2003 Clear Creek NPDES Permit also prohibited, and the 2010 Clear Creek NPDES Permit now prohibits, the bypass or overflow of waste to surface waters. 2003 Clear Creek NPDES Permit § A.3.; 2010 Clear Creek NPDES Permit § III.B.

Like the NPDES permits for the Clear Creek Wastewater Treatment Plant, the City's 2007 Stillwater NPDES Permit contains strict prohibitions regarding discharges from the City's sewage infrastructure, which includes the Collection System. The 2007 Stillwater NPDES Permit prohibits the discharge of wastewater from anywhere other than the single, authorized discharge point to the Sacramento River, and certain land application locations. 2007 Stillwater NPDES Permit § III.A. and Attachment E (Monitoring and Reporting Program) § X.D.3. The 2007 Stillwater NPDES Permit also prohibits the bypass or overflow of waste to surface waters. 2007 Stillwater NPDES Permit § III.B.

The City operates and manages its Collection System improperly, resulting in sewer system overflows ("SSOs") of raw and/or inadequately treated sewage. According to reports submitted by Redding to the State Board and the Regional Water Quality Control Board for the Central Valley Region ("Regional Board"), the City has spilled raw and/or inadequately treated sewage from its Collection System on at least 78 separate occasions in the last 5 years.² In total, the City spilled at least 411,925 gallons of sewage, and reported that 324,025 gallons of sewage reached surface waters. The City's ongoing and continuous SSOs are violations of the CWA and demonstrate serious problems with the City's operation and maintenance of its Collection System.

IV. THE CITY'S MS4 AND ITS OBLIGATIONS UNDER THE CLEAN WATER ACT TO KEEP SEWAGE OUT OF THE MS4

The City-owned and operated MS4 provides storm water drainage for the residents and businesses of Redding in the same areas served by the Collection System. An MS4 is a system of

² Attached hereto as Exhibit A and Exhibit B are tables that lists the date and location of the 78 reported SSOs. Exhibit A and Exhibit B list the SSOs the City reported in the last 5 years in SSO reports submitted to the State Board and Regional Board, in the City's internal SSO reports, and in other correspondence to and from the City indicating SSOs from its Collection System. Exhibit A identifies SSOs from the Collection System upstream of the Clear Creek Wastewater Treatment Plant. Exhibit B identifies SSOs from the Collection System upstream of the Stillwater Wastewater Treatment Plant.

conveyances that includes but is not limited to streets, curbs, gutters, other paved surfaces, ditches, man-made channels, catch basins and/or storm drains owned or operated by a State, city, or town that is designed or used for collecting or conveying storm water and that discharges to waters of the United States.³ See 40 C.F.R. § 122.26(b)(8)(i)-(ii); *see also* 40 C.F.R. § 122.26(b)(18). The City charges single-family dwellings \$1.32 per month and commercial and industrial users \$19.07 per month (per impervious acre of land) to provide storm water drainage services.

The City's MS4 consists of 191 miles of channels and ditches and 249 miles of storm drain pipes, as well as the streets, curbs, gutters, and other paved surfaces in the City. There are approximately 10,454 storm drain inlets and approximately 1,763 outfalls from the storm drain system. The pollutants that enter the storm drain network in the City are discharged to the surface waters in the area, including the Sacramento River.

Clean Water Act section 402(p), 33 U.S.C. § 1342(p), establishes a framework for regulating municipal storm water discharges under NPDES Permits. Section 402(p) of the CWA requires dischargers of municipal storm water to obtain and comply with an NPDES permit. See 33 U.S.C. § 1342(p). Section 402(p)(3)(B) of the CWA sets forth the requirements that must be in all MS4 permits, including requirements that prohibit discharges into the storm sewers and reduce pollutants in discharges to receiving waters. 33 U.S.C. § 1342(p)(3)(B). In 2005 the City became a permittee on the MS4 Permit. As a permittee on the MS4 Permit, the City is required to effectively prohibit the discharge of non-storm water into its MS4. See MS4 Permit, Discharge Prohibitions, B.3 and Storm Water Management Program Requirement D.2.c.3.

The sewage discharged from the City's Collection System is non-storm water. Thus, when this sewage discharges to the City's MS4, it is a discharge of non-storm water to the MS4. Of the 78 SSOs reported in the past five (5) years, the City reported that 41 reached the storm drains, streets, curbs, gutters, and paved surfaces that make up the City's MS4. The numerous, repeated, and ongoing discharges of SSOs to the MS4 evidence a failure by the City to effectively prohibit the discharge of non-storm water in the form of SSOs to the MS4. The City's failure is due in part to the improper management and operation of the Collection System, and in part to the inadequate management and operation of the MS4. For example, the City's Storm Water Management Program ("SWMP") does not contain adequately developed or implemented measures to effectively prohibit non-storm water discharges to the MS4.

V. THE LOCAL WATERWAYS RECEIVING THE ILLEGAL DISCHARGES OF POLLUTANTS AND THE ENVIRONMENTAL IMPACTS FROM THOSE DISCHARGES

A. The Receiving Waters

The Collection System runs through several watersheds that ultimately drain to the

³ An MS4 is further defined as a sewer system that is not a combined sewer, and is not part of a Publicly Owned Treatment Works. See 40 C.F.R. § 122.26(b)(8)(iii)-(iv).

Sacramento River. The water bodies in these watersheds include, but are not limited to: Boulder Creek, Calaboose Creek, Canyon Hollow Creek, Churn Creek, Jenny Creek, Little Churn Creek, Linden Ditch, Sciarra Slough, the Sacramento River, and unnamed tributaries to these waters (collectively referred to as "Receiving Waters"). The Sacramento River and its tributaries provide habitat for aquatic species, as well as opportunities for wildlife viewing, fishing, and other water-related recreation such as swimming, wading and kayaking. According to the State of California, the beneficial uses of the Receiving Waters include contact and non-contact water recreation (such as fishing), wildlife habitat, municipal and domestic water supply, agricultural water supply and stock watering, navigation, spawning and migration for warm and cold water species, and freshwater habitat for cold and warm water aquatic species.⁴

The Sacramento River in the Redding area is listed on the State of California's 2010 Clean Water Act Section 303(d) list of impaired water bodies due to unknown toxicity.⁵ Many of the pollutants found in raw and inadequately treated sewage are toxic. By discharging raw and/or inadequately treated sewage and its associated pollutants to waters of the United States in violation of the Clean Water Act, the City has contributed, and continues to contribute to the impairment of the Sacramento River. As such, the City's violations of the Clean Water Act directly harm CSPA's members' use and enjoyment of the Sacramento River, as well as its tributaries.

B. Pollutants in Sewage and Their Impacts to the Environment and Human Health

Raw and/or inadequately treated sewage harms the Receiving Waters and poses a serious risk to fisheries, wildlife habitat, and human health. Sewage contains human waste, viruses, protozoa, mold spores and bacteria. In addition, raw and/or inadequately treated sewage contains chemicals that cause cancer or reproductive toxicity. These chemicals come from solvents, detergents, cleansers, inks, pesticides, paints, pharmaceuticals, and other chemicals used by households and businesses and then discarded to sewage collection systems.⁶ High concentrations of these pollutants are typically found in raw and/or inadequately treated sewage. SSOs from the City's Collection System result in the addition of these pollutants to the City's MS4 and to the Receiving Waters.

SSOs also affect people who eat fish caught in the Receiving Waters. Toxic chemicals bio-accumulate in the Receiving Waters' food web; *i.e.*, contaminants absorbed by plankton accumulate in fish and birds farther up the food chain, and ultimately transfer to human consumers. Contamination of fish is particularly harmful to people who eat an above-average amount of local fish.

⁴ See Water Quality Control Plan, Sacramento and San Joaquin River Basins (Region 4), Chapter 2.

⁵ See http://maps.waterboards.ca.gov/webmap/303d/files/2010_USEPA_approv_303d_List_Final_122311wsrsrcs.xls. A water body that is listed as impaired cannot support its designated beneficial uses.

⁶ See People for Puget Sound, "Puget Sound Georgia Basin Sewage Report," February 1995; see also Excerpt from "Safe Substitutes at Home: Non-Toxic Household Products," Gary A. Davis and Em Turner, University of Tennessee-Knoxville Waste Management Institute, es.epa.gov/techinfo/facts/safe-fs.html; see also Frick, E., et al, Presence of Pharmaceuticals in Wastewater Effluent and Drinking Water, Metropolitan Atlanta, Georgia July-September 1999, Proceedings of the 2001 Georgia Water Resources Conference, March 26-27, 2001.

Even SSOs that do not reach the Receiving Waters, but instead discharge to public streets, public buildings and grounds, private yards or homes, pose significant health risks. For example, exposure to raw and/or inadequately treated sewage can cause a variety of health problems, including gastroenteritis, respiratory illness, ear, nose, and throat problems, and skin rashes. Mold spores can establish an ecological niche when they are carried onto a homeowner's property after contact with an SSO, creating an ongoing health risk from chronic exposure. SSOs also diminish property values and impose severe nuisance on local residents.

VI. THE CITY'S DISCHARGES OF SSOs FROM THE COLLECTION SYSTEM VIOLATE ITS CLEAR CREEK AND STILLWATER NPDES PERMITS

The Clean Water Act requires that all regulated dischargers comply with the terms and conditions of their NPDES permit. *See* 33 U.S.C. §§ 1311(a), 1365. Any violation of the 2003 Clear Creek NPDES Permit, the 2010 Clear Creek NPDES Permit, or the 2007 Stillwater NPDES Permit is an enforceable violation of the Clean Water Act. 33 U.S.C. § 1365(f). As explained above, the City's 2003 Clear Creek NPDES Permit, the 2010 Clear Creek NPDES Permit, and the 2007 Stillwater NPDES Permit prohibit the discharge of wastewater, including SSOs, from the Collection System. *See* 2003 Clear Creek NPDES Permit §§ A.1. and A.3.; 2010 Clear Creek NPDES Permit §§ III.A. and III.B. and Attachment E (Monitoring and Reporting Program) § X.D.3.; 2007 Stillwater NPDES Permit §§ III.A. and III.B. and Attachment E (Monitoring and Reporting Program) § X.D.3. ("Sanitary sewer overflows are prohibited by this order"). The City has violated and continues to violate these provisions by discharging SSOs from the Collection System. At a minimum, the City violated the 2003 Clear Creek NPDES Permit and the 2010 Clear Creek NPDES Permit on the dates set forth in Exhibit A (identifying 61 SSOs), and the City violated the 2007 Stillwater NPDES Permit on the dates set forth in Exhibit B (identifying 17 SSOs).

CSPA believes that additional information will be discovered that indicates the City has not reported each and every SSO from the Collection System, or has misreported SSOs occurring within the last five (5) years. Moreover, CSPA believes that the City lacks an adequate monitoring program to detect, report, and address SSOs and their impacts. Thus, CSPA believes that SSOs in addition to those identified in Exhibit A and Exhibit B will be discovered through this enforcement action. CSPA puts the City on notice that all SSOs from the Collection System occurring in the last five (5) years, whether specifically reported or not, as well as any future violations, will be included in this litigation.

Each day prior to September 23, 2010 that the City discharged raw and/or inadequately treated sewage from the portion of the Collection System that conveys sewage to the Clear Creek Wastewater Treatment Plant is a separate and distinct violation of Sections A.1. and A.3. of the City's 2003 Clear Creek NPDES Permit and the Clean Water Act. Each day since September 23, 2010 that the City discharged or continues to discharge raw and/or inadequately treated sewage from the portion of the Collection System that conveys sewage to the Clear Creek Wastewater Treatment Plant is a separate and distinct violation of Section III.A. and III.B. of the City's 2010 Clear Creek NPDES Permit and the Clean Water Act. Similarly, each day since June 21, 2007

that the City discharged or continues to discharge raw and/or inadequately treated sewage from the portion of the Collection System that conveys sewage to the Stillwater Wastewater Treatment Plant is a separate and distinct violation of Section III.A. and III.B. of the City's 2007 Stillwater NPDES Permit and the Clean Water Act. The City's violations will continue each day it discharges SSOs in violation of the requirements of its 2010 Clear Creek NPDES Permit or its 2007 Stillwater NPDES Permit and the Clean Water Act. The City is subject to penalties for all violations of the Clean Water Act occurring in the five (5) years prior to the date of this Notice Letter.

VII. THE CITY'S DISCHARGES OF SSOs TO ITS MS4 VIOLATE THE MS4 PERMIT

As explained, the Clean Water Act requires permittees to comply with all terms and conditions of their NPDES permits, and a violation of an NPDES permit is an enforceable violation of the Clean Water Act. *See* 33 U.S.C. §§ 1311(a), 1365. The MS4 Permit contains prohibitions and limitations on the discharge of pollutants into Redding's MS4. Discharge Prohibition B.3 and SWMP Requirement D.2.c.3. & 4. of the MS4 Permit require Redding to effectively prohibit discharges of non-storm water into the MS4. Redding has violated and continues to violate these provisions by failing to effectively prohibit the discharge of SSOs from the Collection System into the MS4.

Redding has discharged SSOs from its Collection System into the MS4 on at least 41 separate occasions in the past five (5) years. *See* Exhibit C attached hereto (identifying dates and locations of SSOs that entered the MS4).⁷ Further, Redding's SWMP is devoid of explicit requirements that effectively prohibit the discharge of non-storm water in the form of SSOs to the MS4. As a result, Redding is in daily violation of Discharge Prohibition B.3. and SWMP Requirement D.2.c.3. and 4. of the MS4 Permit and the Clean Water Act. At a minimum, Redding violates Discharge Prohibition B.3. and Storm Water Management Program Requirement D.2.c.3. and 4. of the MS4 Permit and the Clean Water Act every time an SSO from the Collection System enters the MS4.

CSPA believes that additional information will be discovered that indicates Redding has not reported each SSO from the Collection System that has entered the MS4 in the past (5) five years. CSPA puts Redding on notice that each discharge of an SSO into Redding's MS4 during the past five (5) years, whether specifically reported or not, will be included in this enforcement action. CSPA will include additional violations when information becomes available.

Every day Redding failed and continues to fail to effectively prohibit non-storm water discharges in the form of SSOs to the MS4 is a separate and distinct violation of the MS4 Permit and the Clean Water Act.⁸ Redding's violations of Discharge Prohibition B.3. and SWMP

⁷ Exhibit C sets forth the SSOs Redding reported to the State Board and Regional Board as reaching the storm drain pipes, channels, ditches, streets, curbs, gutters, and other paved surfaces of its MS4.

⁸ At a minimum, Redding violates Discharge Prohibition B.3. and Storm Water Management Program Requirement D.2.c.3. and 4. of the MS4 Permit and the Clean Water Act every time an SSO from the Collection System enters the MS4.

Requirement D.2.c.3. and 4. of the MS4 Permit are ongoing and continuous. Redding's violations will continue every day and/or occasion it fails to effectively prohibit non-storm water discharges in the form of SSOs into the MS4 in violation of the requirements of the MS4 Permit and the Clean Water Act. Redding is subject to penalties for all violations of the MS4 Permit and Clean Water Act occurring during the past five (5) years.

VIII. CONCLUSION

CSPA has retained legal counsel to represent it in this matter. Please direct all communications to Lawyers for Clean Water, Inc. CSPA's counsel's contact information is provided below.

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Upon expiration of the 60-day notice period, CSPA will file a citizen suit enforcement action pursuant to Section 505(a) of the Clean Water Act, 33 U.S.C. § 1365(a), for the above-referenced violations. During the 60-day notice period, however, CSPA is willing to discuss effective remedies for the violations noted in this letter. If the City wishes to pursue such discussions in the absence of litigation, CSPA suggests that it initiate those discussions immediately.

Sincerely,



Bill Jennings, Executive Director
California Sportfishing Protection Alliance

SERVICE LIST

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EXHIBIT
A

SSOs from Collection System Tributary to
Clear Creek Wastewater
Treatment Plant

Spill ID Number	Date	Location
656783	September 3, 2007	1000 East Street Redding 96001
704995	October 10, 2007	2070 Skyline Drive Redding 96001
705035	October 10, 2007	795 Lincoln Street Redding 96001
706433	October 15, 2007	3035 Pioneer Drive Redding 96001
705693	October 15, 2007	890 Pioneer Drive Redding 96001
710886	January 4, 2008	Lakeside Drive Redding 96001
712399	February 2, 2008	East Cypress Avenue Redding 96002
713952	February 25, 2008	Eureka Way @ Willis St. Redding
714573	March 3, 2008	3105 Foothill Boulevard Redding 96001
714647	March 5, 2008	3105 Foothill Boulevard Redding 96001
715594	March 31, 2008	Almond Street Redding
716213	April 15, 2008	2334 Washington Ave Redding 96001
717019	May 3, 2008	1055 Harpole Redding 96002
719566	June 13, 2008	2830 King Street Redding 96003
721140	June 29, 2008	1310 Ridge Drive Redding 96001
724287	August 5, 2008	Remington Lift Station
724780	August 14, 2008	Manhole N2-35 along Placer St. Redding
726598	September 18, 2008	1035 Placer Street Redding
726890	September 24, 2008	Pioneer High School Redding
727172	September 29, 2008	410 Overhill Dr. Redding
727241	October 1, 2008	410 Overhill Drive Redding
727712	October 8, 2008	Shasta @ Almond Redding
727758	October 10, 2008	963 West St. Street Redding 96001
727792	October 11, 2008	2439 Placer Street Redding 96001
729098	November 8, 2008	LeBrun Ave Redding
729815	November 24, 2008	Lancers Lane @ Burton Ct. manhole J10-15 Redding 96003
730954	December 20, 2008	2933 West Way Redding 96002
731259	December 30, 2008	1130 Continental Street Redding 96001
731260	December 30, 2008	1130 Continental Street Redding 96001
731515	January 4, 2009	975 North Market Street Redding 96001
731520	January 6, 2009	1717 Benton Drive Redding 96001
731487	January 6, 2009	1717 Benton Drive Redding 96001
731669	January 9, 2009	2151 Wilson Avenue Redding 96003
735094	March 16, 2009	Willis Street Redding 96001
735098	March 16, 2009	Orange Avenue Redding 96001
735145	March 16, 2009	975 Market Street Redding 96001
735141	March 16, 2009	410 Overhill Drive Redding 96001
735435	March 24, 2009	Venus Way Redding 96002
735663	March 27, 2009	Tiger Field Redding
737120	May 2, 2009	1717 Benton Drive Redding 96003
746709	November 7, 2009	Cascade Theater Redding
747466	December 10, 2009	1540 Cottonwood Avenue Redding 96001
748245	January 5, 2010	705 Loma Vista Drive Redding 96002
748320	January 11, 2010	Sewer pipe crossing Cypress Bridge- near middle of bridge Cypress Avenue Redding 96001

SSOs from Collection System Tributary to
Clear Creek Wastewater
Treatment Plant

Spill ID Number	Date	Location
748623	January 20, 2010	Manhole L3-8, in Lakeside Dr. near the street's intersection with Regatta Ct. Lakeside Dr Redding 96001
749190	February 7, 2010	SSO discharged from rod hole # J5-41, located in West St right-of-way Redding 96001
749193	February 8, 2010	3252 Auburn Drive Redding 96001
749811	February 16, 2010	3100 Foothill Boulevard Redding 96001
752851	June 1, 2010	Manhole # L4-34, located in alley behind residence at 1800 Mesa St Redding 96002
754690	July 5, 2010	Manhole M6-5, located in street in front of 1923 Sonoma St. Redding 96001
756763	September 2, 2010	1025 Denton Way Redding 96001
758118	October 24, 2010	2700 Market Street Redding 96001
759392	December 11, 2010	2222 California Street Redding 96001
762373	January 19, 2011	710 Pioneer Drive Redding 96001
763161	February 4, 2011	Manhole L6-3, in Chestnut St R-O-W adjacent to 1918 Chestnut St Redding 96001
765610	March 14, 2011	Manhole K6-48, in the Tehama St ROW north of 1100 Butte St Tehama Street Redding
765612	March 28, 2011	3251 School Street Redding
768481	June 20, 2011	Manhole L7-79, in Orchard Estates ROW north of 615 Orchard Estates Drive Redding
771521	August 22, 2011	2475 Beverly Drive Redding 96002
775260	January 1, 2012	1261 Dusty Lane Redding 96001
778798	February 15, 2012	3751 Traverse Street Redding 96001

EXHIBIT
B

SSOs from Collection System Tributary to
Stillwater Wastewater
Treatment Plant

Spill ID Number	Date	Location
715919	April 6, 2008	Magnums Way Spill Redding
717203	May 9, 2008	1977 Salzburg Dr. Redding
718946	June 3, 2008	3879 Patterson Court Redding 96003
730313	December 7, 2008	300 Boulder Creek Drive Redding 96001
733610	February 16, 2009	407 Lake Boulevard Redding 96001
737314	May 9, 2009	7831 Terra Linda Way Redding 96002
747268	November 27, 2009	In greenway behind 11780 Talofa Dr in Redding, CA Talofa Drive Redding 96003
749182	February 5, 2010	630 Twin View Boulevard Redding 96003
756301	August 18, 2010	500 Davis Ridge Road Redding 96002
756302	August 18, 2010	610 Churn Creek Road Redding 96002
757165	September 3, 2010	901 College View Drive Redding 96003
759101	November 10, 2010	Manhole M6-5, located in street in front of 1923 Sonoma St. Hemingway Street Redding 96001
763169	February 16, 2011	Manhole E8-1, adjacent to the property at 11082 Campers Ct. Redding 96003
766781	April 21, 2011	Manhole C5-58, adjacent to 1065 Dara Ct Dara Court Redding
774437	November 28, 2011	Manhole #D7-11, in Wright Dr. R-O-W, adjacent to property address 485 Wright Dr. Redding
775937	January 9, 2012	Manhole K11-36, in greenway along Churn Creek behind 2118 Sophy Place Redding 96001
778800	February 26, 2012	Manhole K11-22, located in Victor Ave. ROW near 1600 Victor Ave. Redding 96003

Exhibit
C

Non-Stormwater Discharges in the Form of SSOs to MS4

Spill ID Number	Date	Location
656783	September 3, 2007	1000 East Street Redding 96001
704995	October 10, 2007	2070 Skyline Drive Redding 96001
705035	October 10, 2007	795 Lincoln Street Redding 96001
710886	January 4, 2008	Lakeside Drive Redding 96001
712399	February 2, 2008	East Cypress Avenue Redding 96002
714647	March 5, 2008	3105 Foothill Boulevard Redding 96001
715594	March 31, 2008	Almond Street Redding
716213	April 15, 2008	2334 Washington Ave Redding 96001
717019	May 3, 2008	1055 Harpole Redding 96002
717203	May 9, 2008	1977 Salzburg Dr. Redding
726598	September 18, 2008	1035 Placer Street Redding
727712	October 8, 2008	Shasta @ Almond Redding
727758	October 10, 2008	963 West St. Street Redding 96001
729098	November 8, 2008	LeBrun Ave Redding
729815	November 24, 2008	Lancers Lane @ Burton Ct. manhole J10-15 Redding 96003
730954	December 20, 2008	2933 West Way Redding 96002
731259	December 30, 2008	1130 Continental Street Redding 96001
731260	December 30, 2008	1130 Continental Street Redding 96001
731520	January 6, 2009	1717 Benton Drive Redding 96001
731487	January 6, 2009	1717 Benton Drive Redding 96001
733610	February 16, 2009	407 Lake Boulevard Redding 96001
735094	March 16, 2009	Willis Street Redding 96001
735098	March 16, 2009	Orange Avenue Redding 96001
735435	March 24, 2009	Venus Way Redding 96002
735663	March 27, 2009	Tiger Field Redding
747466	December 10, 2009	1540 Cottonwood Avenue Redding 96001
748245	January 5, 2010	705 Loma Vista Drive Redding 96002
752851	June 1, 2010	Manhole # L4-34, located in alley behind residence at 1800 Mesa St Redding 96002
754690	July 5, 2010	Manhole M6-5, located in street in front of 1923 Sonoma St. Redding 96001
756763	September 2, 2010	1025 Denton Way Redding 96001
758118	October 24, 2010	2700 Market Street Redding 96001
759101	November 10, 2010	Manhole M6-5, located in street in front of 1923 Sonoma St. Hemingway Street Redding 96001
763161	February 4, 2011	Manhole L6-3, in Chestnut St R-O-W adjacent to 1918 Chestnut St Redding 96001
763169	February 16, 2011	Manhole E8-1, adjacent to the property at 11082 Campers Ct. Redding 96003
765610	March 14, 2011	Manhole K6-48, in the Tehama St ROW north of 1100 Butte St Tehama Street Redding
766781	April 21, 2011	Manhole C5-58, adjacent to 1065 Dara Ct Dara Court Redding
768481	June 20, 2011	Manhole L7-79, in Orchard Estates ROW north of 615 Orchard Estates Drive Redding
771521	August 22, 2011	2475 Beverly Drive Redding 96002

Non-Stormwater Discharges in the Form of SSOs to MS4

Spill ID Number	Date	Location
774437	November 28, 2011	Manhole #D7-11, in Wright Dr. R-O-W, adjacent to property address 485 Wright Dr. Redding
775260	January 1, 2012	1261 Dusty Lane Redding 96001
778800	February 26, 2012	Manhole K11-22, located in Victor Ave. ROW near 1600 Victor Ave. Redding 96003